

VIA ECF

The Honorable Arun Subramanian
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007-1312

Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.¹
- Defendants' contract reviewers have reviewed approximately 837,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference.
- Defendants have produced approximately 1,200 documents and over 12 billion observations of data covering 7 different countries in this litigation to date.
- Defendants expect to produce over 8,000 additional documents by early next week, and hundreds of thousands of additional documents by the end of the month.

[signatures on following page]

¹ Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: November 8, 2024

Respectfully submitted,

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cc: All Counsel of Record (via ECF)